

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Philip A Kelsch	:	Chapter 13
Melanie Kelsch	:	Case No.: 25-10822-AMC
	:	
Debtors(s)	:	

MOTION TO APPROVE NEW DEBT

Debtors, Philip and Melanie Kelsch, through his attorney, moves this Court for an order allowing him to incur debt, and states as follows:

1. Debtors filed a Chapter 13 Bankruptcy on February 28, 2025.
2. The Debtors have filed a plan, but it has not yet been confirmed.
3. The Debtors' current lease on their 2022 Ford Edge is set to expire on June 24, 2025.
4. The Debtors request approval to purchase a 2020 Hyundai Venue or similar vehicle and incur additional debt in the approximate amount of \$14,760.09, with monthly payments of \$301.00 for a term of 48 months, which will be paid directly by the Debtors.
5. A proposed sale agreement is attached as Exhibit A.
6. At the time of filing this Motion, the debtors are current on payments due to the Chapter 13 Trustee.

WHEREFORE, the Debtors, by and through the undersigned counsel, requests this Honorable Court to enter an Order allowing the incurrence of additional debt in support of the debtors obtaining financing to purchase a new vehicle.

Dated: May 28, 2025

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